

Defendants.

Case No. 2:24-cv-01060-WB

only, not Ms. Goodman) a follow up Zoom settlement conference for May 15 (ECF No. 25), during which Plaintiff and Ms. Hanoch made further progress. ECF No. 26.

5. Magistrate Judge Lloret has set one more Zoom Settlement Conference (for Plaintiff and Ms. Hanoch) for May 22, 2024. Plaintiff and Ms. Hanoch are close to a resolution and agree that by the end of the day on May 22 they will be able to report to the Court as to the status of their discussions.

6. Plaintiff and Ms. Hanoch agree that a resolution is more likely (and it would conserve resources) if Ms. Hanoch's deadline to respond to the First Amended Complaint is extended by two weeks (to June 7, 2024) so that Ms. Hanoch need not expend legal fees preparing that motion and brief while the parties are so close to a resolution.

7. Ms. Goodman consents to this request.

8. The parties, therefore, stipulate and respectfully request that Ms. Hanoch's deadline to respond to the Complaint be extended to June 7, 2024. No further extensions of this deadline will be requested. A proposed order is attached to this Stipulation.

Dated: May 17, 2024

Respectfully submitted,

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	<u>/s/ Daniel W. Katz</u> Daniel W. Katz Law Offices of Daniel Katz 121 S. Broad Street, SUITE 1300 Philadelphia, PA 19107 Telephone: 215-840-6616 Email: dannywkatz@gmail.com <i>Counsel for Defendant Goodman</i>

SO ORDERED.

BY THE COURT:

/s/Wendy Beetlestone, J.

The Honorable Wendy Beetlestone
United States District Judge

DATE: 05/21/24